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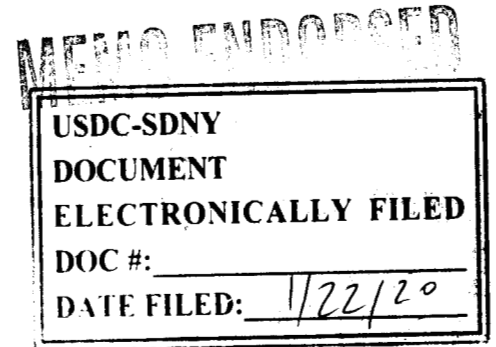
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January 21, 2020

Via ECF

The Honorable Ronnie Abrams
Thurgood Marshall U.S. Courthouse
40 Foley Square, Room 2203
New York, NY 10007
Telephone: 212-805-0284



Re: *Great Lakes Insurance SA in its Own Right and/or as Subrogee of Pacific Gulf Shipping Co. v. American Steamship Owners Mutual Protection and Indemnity Association, Inc., et al., Case No. 1:19-cv-10656*
Plaintiff's Letter-Motion Requesting Adjournment of the January 31, 2020 Scheduling Conference
Chalos & Co. Ref: 2511.001

Dear District Judge Abrams:

In accordance with the Local Rules of the United States District Court for the Southern District of New York and this Court's Individual Rules & Practices in Civil Cases, we, on behalf of Plaintiff Great Lakes Insurance SA in its Own Right and/or as Subrogee of Pacific Gulf Shipping Co. (hereinafter "Great Lakes" or "Plaintiff"), respectfully submit this Letter-Motion to request an adjournment of the scheduling conference presently set for January 31, 2020.

This case was commenced on November 18, 2019. Thereafter, on November 21, 2019, this Honorable Court issued an Order setting a scheduling conference for January 31, 2020 at 11:30 a.m. EST. *See* DE 9. Organizational Defendants American Steamship Owners Mutual Protection and Indemnity Association Inc. and Shipowners Claims Bureau Inc. filed a motion to dismiss on December 12, 2019. *See* DE 19-20. Plaintiff's Opposition was filed this past Friday on January 17, 2020 (DE 33) and Organizational Defendants' Reply is not due to be filed until January 31, 2020.

More recently, Defendants George and Efstathios Gourdomichalis filed a separate threshold motion to dismiss on Friday January 17, 2020. *See* DE 31-32. Plaintiff's Opposition



brief is due on February 14, 2020 and the individual Defendants' Reply brief is to be filed on February 24, 2020. *See* DE 35.

Counsel for plaintiff is currently set to appear before U.S. District Judge Mosman for summary judgment motion oral argument on January 31, 2020 in the District of Oregon in the matter of *Pacific Gulf Shipping Co., et al. v. Adamastos Shipping & Trading S.A.*, 3:18-cv-02076 (D. Or. 2018). A final pretrial conference will be held before the District Court in Oregon on March 2, 2020. Trial is in that matter for the period of at least March 10-13, 2020.

This is Plaintiff's first request for adjournment of the scheduling conference. Plaintiff's counsel has notified Defendants' counsel of the conflict and requested the position of all parties on the proposal to adjourn the scheduling conference.¹ Counsel for Defendants have neither consented nor objected. Bearing in mind the Court's requirement that the parties submit a Joint Letter and proposed Case Management Plan seven (7) days prior to the scheduling conference, Plaintiff respectfully requests that the scheduling conference be adjourned to a date convenient to the Court after March 23, 2020.

In advance, we thank the Court for its attention and assistance in this matter.

Respectfully submitted,

CHALOS & Co., P.C.

/s/ Briton P. Sparkman
George M. Chalos, Esq.
Briton P. Sparkman, Esq.

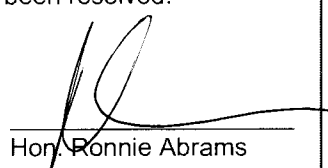
cc: *Via ECF Only*

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Attorneys for Defendants
American Steamship Owners Mutual
Protection and Indemnity Association,
Inc. and Shipowners Claims Bureau Inc.

Blank Rome, LLP
Attorneys for Defendants
George Gourdomichalis and
Efstathios Gourdomichalis

The initial status conference scheduled for January 31, 2020 is hereby adjourned. No later than January 29, 2020, the parties shall jointly file a letter informing the Court whether they seek to adjourn the initial conference until after the pending motions to dismiss have been resolved.

SO ORDERED.


Hon. Ronnie Abrams
1/22/2020

¹ Counsel for Defendants George and Efstathios Gourdomichalis are aware of the conflict as other attorneys at the Blank Rome, LLP law firm represent one of the defendants which made the motion for summary judgment in the Oregon proceeding, i.e. - Vigorous Shipping & Trading, S.A.